

JOYCE L. DAVIS AND ASSOCIATES

Attorneys at Law
Post Office Box 709
Raleigh, North Carolina 27602

Two Hannover Square, Suite 1730
Raleigh, North Carolina 27601

REC'D TN
REGULATORY AUTH.

'99 APR 22 PM 12 14

OFFICE OF THE
EXECUTIVE SECRETARY

Joyce L. Davis
*Zoë G. Mahood
Everette P. Winslow
Also Licensed in Florida

OF COUNSEL:
Richard W. Rutherford
Telephone (919) 834-6534
Facsimile (919) 834-6534

April 21, 1999

OVERNIGHT MAIL

Federal Express Tracking No. 805300838534

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

99-00283

Re: Skyline TMC Dialing Parity Plan (for Tennessee Exchange)

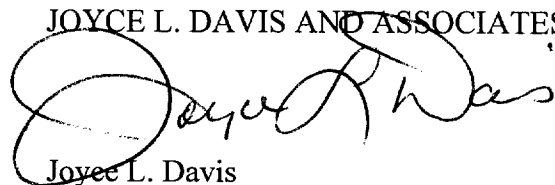
Dear Mr. Waddell:

Enclosed please find an original and fourteen (14) copies of the Dialing Parity Plan for Skyline Telephone Membership Corporation. Please return to us the extra copies stamped "filed" in the enclosed, self-addressed and postage pre-paid envelope. Also enclosed you will find the filing fee in the amount of \$25.

Thank you for your cooperation and assistance in this matter. Should you have any questions, please do not hesitate to call.

Very truly yours,

JOYCE L. DAVIS AND ASSOCIATES



Joyce L. Davis

JLD/lm
Enclosure
Hobart G. Davis, General Manager

REC'D TN
REGULATORY AUTH. APRIL 22, 1999

'99 APR 22 PM 12 14

SKYLINE TELEPHONE MEMBERSHIP CORPORATION
OFFICE OF THE
INTRALATA TOLL DIALING PARITY IMPLEMENTATION PLAN
(For Tennessee Exchange)

I. Purpose

Skyline TMC describes herein the process for implementing IntraLATA Toll Dialing Parity (Plan) in its exchanges located in the state of Tennessee. The intent of this plan is to provide a proposal that, upon implementation, would provide customers the ability to preselect the telecommunications carrier of their choice for routing their 1+ intraLATA toll calls.

II. IntraLATA Environment

Skyline TMC currently provides 1+intraLATA toll calling. Implementation of 1+intraLATA toll dialing parity will permit our customers to pre-select the carrier of their choice to provide 1+intraLATA long distance services.

III. Implementation Schedule

Skyline TMC will implement intraLATA toll dialing parity beginning with consumers being notified by bill inserts in June 1999 or notification with Skyline TMC's newsletter which is received by each customer in June 1999, and proceed with dialing parity availability on July 22, 1999 in its exchanges. Skyline TMC has one exchange in the State of Tennessee, that being Shady Valley, HNPA 423, NXX-739.

IV. Carrier Selection Procedures

Skyline TMC will implement the full 2-PIC carrier selection methodology. With the full 2-PIC methodology, customers will be able to presubscribe to one telecommunications carrier for interLATA toll calls and presubscribe to the same or a different participating telecommunications carrier, including their existing local exchange company, for intraLATA toll calls. Orders for changes will be accepted and effective July 22 or thereafter, if received after that date.

Skyline TMC employees who communicate with the public, accept customer orders, and serve in customer service capacities will be trained to explain the process to customers for making PIC changes for intraLATA toll calls. Business Office personnel will be prepared to make changes in customer records based upon requests from customers or carriers. Processes will be in place to provide new customers with an opportunity to choose their intraLATA toll carrier from available carriers.

PO Box 759
West Jefferson NC
28694

Customers will be assessed a cost-based PIC change charge for changing their intraLATA carrier. However, for a waiver period of 30 days from July 22, 1999, customers will not be assessed such a charge for their initial intraLATA toll carrier choice.

Existing Customers

Currently Skyline TMC is the 1+intraLATA provider for existing customers in its local exchange areas. Effective July 22, 1999, customers may continue to use Skyline TMC or may presubscribe to any telecommunications carrier offering intraLATA toll service in their exchange. To ensure continued service and minimize customer confusion, customers will remain with Skyline TMC until they affirmatively choose to change intraLATA toll carriers. Customers may make this selection through their own initiative or as a result of the promotional marketing activities of participating intraLATA toll telecommunications carriers. Customers may communicate their choice of carriers directly to Skyline TMC through the local Business Office or indirectly through their selected carriers. A charge will be established for "slamming" or unauthorized PIC changes submitted by carriers for end-user customers.

New Installation Customers

Customers who contact Skyline TMC requesting new telephone exchange service are currently being advised of the telecommunications carriers available to provide interLATA toll service. Upon implementation of intraLATA toll presubscription, the customer will also be advised of the carriers available, (including Skyline TMC), to provide intraLATA toll service in their exchange. The intraLATA toll carriers will be presented in a competitively neutral manner. Customers who do not make a positive choice for an intraLATA toll carrier will be identified as a "no-PIC" and will not be automatically defaulted to a carrier. Customers identified as "no-PIC" within systems will be required to dial 101XXXX to place intraLATA toll calls until they make an affirmative choice for an intraLATA toll carrier.

V. Notification

In advance of the offering of intraLATA toll dialing parity, customers will be notified through a billing insert in their June bill or in Skyline TMC's newsletter that is provided to each customer. (See Attachment B) The notice will include an explanation of intraLATA toll dialing parity, an exchange implementation schedule and a toll free telephone number for customers to direct inquiries. Skyline TMC anticipates that promotional strategies by the carriers will contribute to customer awareness of intraLATA toll dialing parity. Customer telephone directories will be updated as new editions are published to provide customers with information on how to choose an intraLATA toll carrier.

Skyline TMC has assumed that all carriers will carry both interLATA and intraLATA traffic.

VI. Cost Recovery

As stated in section 51.215 of FCC Order 96-333, CC Docket No. 96-98, "a LEC may recover the incremental costs necessary for the implementation of toll dialing parity. The LEC must recover such costs from all providers of telephone exchange service and telephone toll service in the area served by the LEC, including that LEC."

The incremental costs associated with implementing toll dialing parity by Skyline TMC include:

- 1) network hardware upgrades to provide the full 2-PIC methodology;
- 2) central office software upgrades;
- 3) software translations;
- 4) system programming/testing;
- 5) training for Business Office, Marketing, Carrier, Customer Services, and Service Center personnel;
- 6) customer notification (bill message);
- 7) implementation activity.

Cost Recovery for the incremental cost of dialing parity; specific switch software, any necessary hardware and signaling system upgrades, and customer education costs that are strictly necessary to implement dialing parity, will be implemented in a competitively neutral manner across all providers of telephone exchange service and telephone toll service in the area served by Skyline TMC. Incremental costs will be recovered from all carriers through a rate element based upon originating/terminating intrastate switched access minutes of use (MOUs).

ATTACHMENT A

SKYLINE TELEPHONE MEMBERSHIP CORPORATION NOTICE TO MEMBERS NEW OPTIONS FOR INTRALATA LONG DISTANCE SERVICE

Effective July 22, 1999, you may select another company to handle your 1+intraLATA long distance and expanded local calls, calls to points outside your basic local calling area but within your LATA or calling zone. The company you choose may be the same company or a different company than the one that is currently handling your 1+interLATA long distance calls. For more information on LATAs or calling zones, refer to the Customer Guide section of your telephone directory.

IntraLATA calls and expanded local calls (local toll calls) that you dial using 1+the area code and the seven-digit number will be handled by the intraLATA carrier of your choice. Your local service and expanded local calls that are dialed using seven or ten digits (without the 1+) will continue to be handled by Skyline TMC.

You may receive information from long distance companies marketing their services. If you want to select another company to handle your intraLATA long distance and expanded local calls, you should call that company. A charge may apply for each change you make in long distance companies.

If you wish to continue using Skyline TMC to provide your intraLATA long distance and expanded local calling services, no action is required.